M0370088

LISBON VALLEY MINING CO

Ms. Susan White
Utah Division of Oil, Gas, & Mining
1594 West North Temple Suite 1210
Salt Lake City, UT 84114-5801

June 21, 2007

Re: Resolution of Waste Dump Capacities and Topsoil Acreage. Lisbon Valley Mining Company LLC. 920 South County Road 313, La Sal, Utah, 84530.

Dear Susan:

The Lisbon Valley Mining Co LLC (LVMC) respectfully submits this response to the Division's April 25, 2007 Surety Revision letter. The Division's letter identifies some discrepancies between the LVMC February 19, 2007 *Summary Proposed Mine Plan Amendments* (the proposal), Plan of Operations (POO), and Notice of Intent (NOI) regarding waste dump capacities and topsoil acreage.

Two replacement pages are attached for your use. Page 6 is attached as a replacement for the NOI. This page changes total waste from 96,000,000 tons to 90,000,000 tons, which is consistent with the amendment and POO. Section 3.1.6 is attached as a replacement page for the proposal and POO. This section clarifies tons per waste dump within the 90,000,000 ton capacity.

Please call Lantz Indergard at (435) 686 9950 #226 if additional information is needed.

The attached pages were re-typed and incorporated.

Sincerely,

Lantz Indergard PG
Environmental Manager
Lisbon Valley Mining Co LLC

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DIV. OF OIL, GAS & MINING

cc. BLM Moab Field Office, File

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5. **Thickness of soil material to be stockpiled:** Approx. 12 inches
   Area from which soil material can be salvaged: Approx. 1103 acres
   Volume of soil to be stockpiled: Approx. 1,462,216 cu. yds
   (cross reference with item IV-17)

6. **Thickness of overburden:** 0-600 ft

7. Thickness of mineral deposit: 0-600 ft

8. **Volume of refuse, tailings, and processing waste stockpiles:** * cu yds.

- Refuse – Refuse and construction waste will be temporarily stored on site in small manageable piles adjacent to active construction areas and hauled away to a permitted landfill.
- Tailings – Not Applicable
- Heap Leach Material – Up to 45,000,000 tons or 32,500,000 cubic yards of material.
- Overburden/Waste Material – Up to 90,000,000 tons or 61,600,000 cubic yards of material.

9. **Acreage and capacity of tailings ponds and water ponds and water storage ponds to be constructed:** (See Specifics Below) acres
   Acre feet

Facility	Capacity	Acreage
* PLS Pond	28.1 acre ft.	3.1 acres
*ILS Pond	28.1 acre ft	3.1 acres
* Raffinate Pond	28.1 acre ft	3.1 acres
*Storm Water Pond	17.4 acre ft.	1.9 acres
* Emergency Overflow Pond	42.0 acre ft.	4.3 acres

10. **Describe how topsoil or subsoil material will be removed, stockpiled, and protected:** Topsoil resources were evaluated and inventoried during baseline data gathering activities in 1994. This information was checked against USDA, SCS 1991 surveys of the area. Salvage of the A&B horizons of soil will provide 1,462,216 cubic yards of soil material, which will provide approximately 12. 6 inches of cover material during reclamation activities (not including pit areas which are proposed to be kept open following mining). Summo proposes to utilize scrapers to clear and stockpile a minimum of 12 inches of topsoil and subsoil from the facility areas. Organic material (grasses and shrubs) will be collected/mixed with topsoil and stockpiled in the locations shown on Figure 1. Topsoil stockpiles are strategically located throughout the project area for use during final reclamation. Topsoil stockpiles constitute 80 acres of impact.

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